

Message

**From:** Kenney, James [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=CE6FF86939E44DA49D88840B2353F022-KENNEY, JAMES]  
**Sent:** 11/9/2018 7:43:37 PM  
**To:** Thoma, Eben [Thoma.Eben@epa.gov]; Teichman, Kevin [Teichman.Kevin@epa.gov]; Frithsen, Jeff [Frithsen.Jeff@epa.gov]; Burden, Susan [Burden.Susan@epa.gov]  
**Subject:** RE: Please Review by Dec. 3: Alternative Compliance Draft Paper

Thanks Eben and Kevin.

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

I doubt we will hear much more until next week on this one given the holiday weekend.

Thanks,

Jim

Desk/Mobile: (202) 768-2618

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**From:** Thoma, Eben  
**Sent:** Friday, November 9, 2018 12:39 PM  
**To:** Teichman, Kevin <Teichman.Kevin@epa.gov>; Frithsen, Jeff <Frithsen.Jeff@epa.gov>; Burden, Susan <Burden.Susan@epa.gov>  
**Cc:** Kenney, James <Kenney.James@epa.gov>  
**Subject:** RE: Please Review by Dec. 3: Alternative Compliance Draft Paper

Thanks Kevin,

I will go through this but as Jim identified

Ex. 5 Deliberative Process (DP)

# Ex. 5 Deliberative Process (DP)

Thanks,

Eben

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**From:** Teichman, Kevin  
**Sent:** Friday, November 09, 2018 1:04 PM  
**To:** Frithsen, Jeff <Frithsen.Jeff@epa.gov>; Burden, Susan <Burden.Susan@epa.gov>; Thoma, Eben <Thoma.Eben@epa.gov>  
**Cc:** Kenney, James <Kenney.James@epa.gov>  
**Subject:** Fw: Please Review by Dec. 3: Alternative Compliance Draft Paper  
**Importance:** High

All:

We (ORD) has received the attached draft ECOS, member states, and EDF report for review. It's short -- 18 pages.

## **Ex. 5 Deliberative Process (DP)**

Thanks.

Kevin

Kevin Teichman

Senior Science Advisor

Office of Research and Development (8101R)

U.S. Environmental Protection Agency

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Washington, DC 20460

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**From:** Kenney, James  
**Sent:** Friday, November 9, 2018 9:13 AM  
**To:** Parikh, Pooja; Hambrick, Amy; Mia, Marcia; Davis, Alison; Teichman, Kevin  
**Cc:** Thoma, Eben; Dewees, Jason  
**Subject:** FW: Please Review by Dec. 3: Alternative Compliance Draft Paper

OAR, OECA, OGC and ORD Oil and Gas Contacts –

Please see the message below and the attached draft report: *Pathways for alternative compliance methodologies - A framework to advance innovation, environmental protection and prosperity*. The draft report is a work product of ECOS, member states and the EDF. It deals with LDAR, equivalency, monitoring and reporting, etc. It is both a policy and technical document and contains recommendations for regulators. We are being asked to review, provide feedback and discuss with the workgroup.

## Ex. 5 Deliberative Process (DP)

I am cc'ing Eben and Jason so they are in the loop.

Thanks,

Jim

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James C. Kenney | Senior Policy Advisor for Oil and Gas

Office of Congressional and Intergovernmental Relations | Office of the Administrator | U.S. EPA

Desk/Mobile: (202) 768-2618 | Email: kenney.james@epa.gov

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**Please note:** I am geographically located in Albuquerque, New Mexico (Mountain Time Zone).

*This message may contain deliberative, attorney-client or otherwise privileged material. Do not release this message without the appropriate review. If you are not the intended recipient, kindly advise and delete this message/attachments. Namaste.*

**From:** Lia Parisien <[lparisien@ecos.org](mailto:lparisien@ecos.org)>  
**Sent:** Wednesday, November 7, 2018 3:32 PM  
**To:** Lia Parisien <[lparisien@ecos.org](mailto:lparisien@ecos.org)>  
**Subject:** Please Review by Dec. 3: Alternative Compliance Draft Paper

Advisory Group Members:

A few months ago we held a kickoff call to discuss plans for an Environmental Defense Fund/ECOS Shale Gas Caucus white paper on pathways for alternative compliance. The paper aims to assist state regulators in implementing oil and gas air rules that encourage innovation, and to help them act on applications for new methane reduction methodologies.

We've incorporated your suggestions and developed a draft paper for your review. Ahead of our next call on **December 3 at 3-4 p.m. Eastern**, please review the attached draft and be prepared to address the following questions::

- Are the lessons learned clear? Does the paper capture your understanding of the challenges of alternative compliance, or is there anything else to add?
- Are the recommendations compelling and comprehensive? Anything else to add?
- What roles would others need to play to carry out the recommendations? What new roles would be required of your agency?
- Are you familiar with any additional shared models that could inform the recommendation?

If you have questions or would like to share suggestions before the call, please email Aileen Nowlan of EDF at [anowlan@edf.org](mailto:anowlan@edf.org) and Lia Parisien of ECOS at [lparisien@ecos.org](mailto:lparisien@ecos.org).

Many thanks,

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Lia Parisien  
Executive Project Manager  
Environmental Council of the States (ECOS)  
(202) 266-4931  
[www.ecos.org](http://www.ecos.org)

*Mark your calendar for the April 8-10, 2019 ECOS Spring Meeting in Crystal City, VA!*

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Lia Parisien  
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